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Attorneys for Defendant
DOMINIC DESMOND CULLEN

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DOMINIC DESMOND CULLEN, *et al.*

Defendants.

Case No.: CR 18-0449 JD

**JOINT REQUEST AND STIPULATION RE:
SETTING DATE FOR ENTRY OF OPEN PLEA;
~~[PROPOSED]~~ ORDER**

This matter is currently set for a status conference and trial setting on June 19, 2019, at 10:30 a.m. The parties have discussed the matter and potential resolution at length and Dominic Desmond Cullen has decided to plead guilty to the Indictment to the Court without the benefit of a plea agreement.

Defense counsel for Mr. Cullen will be out of the State of California on June 19, 2019, and requests that this matter go over to July 10, 2019, for Mr. Cullen's change of plea. As such, Mr. Cullen requests and the parties jointly stipulate that this matter go over to July 10,

1 2019, at 10:30 a.m., for the entry of an open plea. Mr. Cullen's counsel is needed to prepare
2 Mr. Cullen for his change of plea and to further prepare himself for the change of plea.

3 The parties further agree and stipulate that the time between June 19, 2019, through
4 and including July 10, 2019, may be time excluded from the Speedy Trial Act, in order to
5 ensure the reasonable time necessary for the continuity of counsel and the effective
6 preparation of counsel, pursuant to Title 18, United States Code Sections 3161(b), (h)(7)(A),
7 (h)(7)(B)(iv). The parties agree that the ends of justice served by excluding the above period
8 of time outweigh the best interest of the public and the defendant in speedy trial.
9

10 SO STIPULATED.

11 DAVID ANDERSON
12 United States Attorney

13 Dated: June 17, 2019

_____/s/_____
14 THOMAS R. GREEN
15 Assistant United States Attorney

16 Dated: June 17, 2019

_____/s/_____
17 EDWIN K. PRATHER
18 Attorney for Defendant
19 DOMINIC DESMOND CULLEN
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~~PROPOSED~~ ORDER

GOOD CAUSE APPEARING and per the parties' stipulation, IT IS HEREBY ORDERED that the June 19, 2019 status conference be vacated and this matter be set for the entry of an open plea on July 10, 2019, at 10:30 a.m.

The time from June 19, 2019, through and including July 10, 2019, shall be time excluded from Speedy Trial Act calculations, in order to ensure the reasonable time necessary for the continuity of counsel and for the effective preparation and continuity of counsel, pursuant to Title 18, United States Code §§ 3161(b), (h)(7)(A), (h)(7)(B)(iv). The Court finds that the ends of justice served by excluding the above period of time outweigh the best interest of the public and the defendant in speedy trial.

Dated: June 18, 2019



THE HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE